

Federal Defenders
OF NEW YORK, INC.

One Pierrepont Plaza-16th Floor, Brooklyn, NY 11201
Tel: (718) 330-1200 Fax: (718) 855-0760

David E. Patton
*Executive Director and
Attorney-in-Chief*

Deirdre D. von Dornum
Attorney-in-Charge

May 10, 2018

The Honorable Raymond J. Dearie
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Maksim Zaslavskiy (17-CR-647)

Dear Judge Dearie:

I write on consent of the parties to request that time be excluded for the purposes of computing speedy trial time from today until the date of trial – currently scheduled for January 7, 2019. The parties intend to engage in active discussions which we are hopeful will allow us to resolve this matter short of trial. This exclusion of time is in the interest of justice because the parties need to focus our efforts on those negotiations and will not be able to do so while preparing for trial.

We note that time continues to be excluded for at least thirty days from the date our motion was deemed fully submitted – which we believe to the date of this past Tuesday's oral argument. May 8, 2018.

Additionally, given the myriad issues relating to our pending motion, the volume of discovery, and the possibility of a superseding indictment. The parties respectfully request that the Court designate this case as complex for the purposes of future exclusions.

Thank you for your consideration,

/s/Len H. Kamdang
Len Hong Kamdang
Counsel to Maksim Zaslavskiy
Federal Defenders of New York, Inc.
One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201
(718) 407-7414

cc:

Chambers of the Honorable Raymond J. Dearie (via hand delivery)
Government Counsel of Record (via ECF)